

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:		
<b>Orly Zeewy</b>	:		
	<b>Debtor</b>	:	<b>Chapter 13</b>
		:	
<b>Orly Zeewy</b>	:		
	<b>Movant</b>	:	<b>Bankruptcy No. 20-11595 AMC</b>
		:	
<b>v.</b>	:		
		:	
<b>Wells Fargo Bank, National Association as Trustee</b>	:		
<b>for Abfc 2006-Opt3 Trust, Asset Backed Funding</b>	:		
<b>Corporation Asset-Backed Certificates, Series</b>	:		
<b>2006-Opt3</b>	:		
	<b>Respondent</b>	:	
		:	

**RESPONSE OF WELLS FARGO BANK, NATIONAL ASSOCIATION AS TRUSTEE  
FOR ABFC 2006-OPT3 TRUST, ASSET BACKED FUNDING CORPORATION ASSET-  
BACKED CERTIFICATES, SERIES 2006-OPT3 TO EXPEDITED MOTION FOR  
AUTHORITY TO SELL REAL PROPERTY FREE AND CLEAR OF LIENS AND  
ENCUMBRANCES**

Respondent, Wells Fargo Bank, National Association as Trustee for Abfc 2006-Opt3 Trust, Asset Backed Funding Corporation Asset-Backed Certificates, Series 2006-Opt3, by and through its attorneys, Phelan Hallinan Diamond & Jones, LLP, hereby responds to EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY FREE AND CLEAR OF LIENS AND ENCUMBRANCES and in support thereof, avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment
5. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment

6. Admitted.
7. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment
8. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment
9. Conclusion of law.
10. Admitted.

**WHEREFORE**, Respondent, Wells Fargo Bank, National Association as Trustee for Abfc 2006-Opt3 Trust, Asset Backed Funding Corporation Asset-Backed Certificates, Series 2006-Opt3 respectfully requests that this Honorable Court deny EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY FREE AND CLEAR OF LIENS AND ENCUMBRANCES in its entirety without the following provision:

- 1) Debtor shall include in the Order that either **Wells Fargo Bank, National Association as Trustee for Abfc 2006-Opt3 Trust, Asset Backed Funding Corporation Asset-Backed Certificates, Series 2006-Opt3** will be paid in full subject to a proper payoff quote at the time of closing or that any sale short of full payoff will be subject to **Wells Fargo Bank, National Association as Trustee for Abfc 2006-Opt3 Trust, Asset Backed Funding Corporation Asset-Backed Certificates, Series 2006-Opt3's** final approval.
- 2) Closing is required within 30 days of the payoff quote date or a new payoff is required within 30 days of closing.

Respectfully submitted,

Date: July 6, 2020

/s/ Jerome Blank, Esquire  
Jerome Blank, Esq., Id. No.49736  
Phelan Hallinan Diamond & Jones, LLP  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
Phone Number: 215-563-7000 Ext 31625  
Fax Number: 215-568-7616  
Email: jerome.blank@phelanhallinan.com